

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA, *on behalf of himself  
and all others similarly situated,*

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**DEFENDANT’S MOTION TO EXTEND SCHEDULING ORDER DEADLINES BY  
THIRTY DAYS**

Now Comes Defendant QuoteWizard.com, LLC (“QuoteWizard”) and hereby moves, pursuant to Local Rule 16.1(g), for good cause shown, for a thirty-day extension of the deadlines set forth in the post-Scheduling Conference Clerk’s Notice. *See* ECF No. 39. In support of this Motion, QuoteWizard states as follows:

1. Following an April 7, 2020 Scheduling Conference, scheduling deadlines for the initial phase of this case were memorialized in a Clerk’s Notice issued on even date as follows: Initial Disclosures by April 15, 2020; Fact Discovery by June 30, 2020; QuoteWizard’s summary judgment on consent by July 31, 2020; Opposition by August 31, 2020; Reply by September 22, 2020; and Sur-reply by September 28, 2020. *See* ECF No. 39. QuoteWizard seeks to extend each of these deadlines by thirty (30) days due to events occurring subsequent to the Scheduling Conference and which could not possibly have been anticipated by QuoteWizard.

2. At the Scheduling Conference, Plaintiff’s counsel indicated that, from Plaintiff’s viewpoint, initial consent discovery would essentially require only a subpoena to the internet